

Exhibit A

*Redline of Amended Notice of Motion against
Original Notice of Motion*

~~THIS NOTICE OF MOTION AND ACCOMPANYING DOCUMENTS ARE BEING SERVED PURSUANT TO RULE 11 OF THE FEDERAL RULES OF CIVIL PROCEDURE (“FRCP”). THEY WILL NOT BE FILED WITH THE COURT UNTIL AT LEAST 21 DAYS AFTER SERVICE TO ALLOW YOU TO TAKE SUFFICIENT CORRECTIVE ACTION PRIOR TO THE EXPIRATION OF THE 21 DAY PERIOD IN ACCORDANCE WITH FRCP 11(b)(2).~~

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JEFFREY SIMPSON, individually and derivatively, as
managing member of JJ ARCH LLC, suing derivatively as
managing member of ARCH REAL ESTATE HOLDINGS
LLC, and JJ Arch

Plaintiff,

v.

JARED CHASSEN, FIRST REPUBLIC BANK

Defendants.

25-CV-02372 (LTS)

**AMENDED NOTICE OF ARCH REAL ESTATE HOLDINGS LLC’S MOTION FOR
SANCTIONS AGAINST JEFFREY SIMPSON AND HIS COUNSEL PURSUANT TO
RULE 11 OF THE FEDERAL RULES OF CIVIL PROCEDURE**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated April 3, 2025; and the Declaration of Jonathan T. Koevary, Esq. dated April 3, 2025 with all exhibits thereto; Arch Real Estate Holdings LLC (“AREH”) will move the Court before the Honorable Laura Taylor Swain at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, Courtroom 17C, at a date and time to be determined by the Court, for an order pursuant to Rule 11 of the Federal Rules of Civil Procedure seeking sanctions against Plaintiff Jeffery Simpson and his counsel, Robert Lorenc, Esq., and the Lorenc Law Firm and for such other and further relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to S.D.N.Y Local Rule 6.1, and the Court’s Individual Rules, unless otherwise directed by the Court, any opposing affidavits or

answering memoranda must be served within fourteen (14) days of service of the moving papers, and any reply must be served within seven (7) days of service of any answering papers.

PLEASE TAKE FURTHER NOTICE that the relief sought herein is without prejudice to AREH's right to seek sanctions relief upon a separate motion pursuant to 28 U.S.C. § 1447(c).

CERTIFICATION PURSUANT TO RULE 2.b.(ii) of INDIVIDUAL PRACTICES OF CHIEF JUDGE LAURA TAYLOR SWAIN: the undersigned has used their best efforts to resolve informally the matters raised in its submission.

Dated: New York, New York
April ~~3~~24, 2025

OLSHAN FROME WOLOSKY LLP
Attorneys for Arch Real Estate Holdings LLC

By: /s/ Jonathan T. Koevary
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that, on April 24, 2025, a true and correct copy of the foregoing document was served electronically by the Court's CM/ECF system on all parties entitled to such notice.

/s/ Jonathan T. Koevary
Jonathan T. Koevary

Summary report: Litera Compare for Word 11.10.0.38 Document comparison done on 4/24/2025 10:35:40 AM	
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Intelligent Table Comparison: Active	
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Table moves from	0
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Embedded Excel	0
Format changes	0
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